



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 5**  
**77 WEST JACKSON BOULEVARD**  
**CHICAGO, IL 60604-3590**

**REPLY TO ATTENTION OF**  
**ECW-15J**

**VIA ELECTRONIC MAIL**

Curtis McCall Sr., Chairman  
Commonfields of Cahokia Public Water District  
2525 Mousette Lane  
Cahokia, Illinois 62206

[rwilliams@centownil.com](mailto:rwilliams@centownil.com)

Subject: Notice of Opportunity to Confer Regarding Potential Violations of the Clean Water Act

Dear Chairman McCall:

This letter is an offer to confer regarding potential Clean Water Act (CWA) violations that the U.S. Environmental Protection Agency has identified as a result of its ongoing investigation of sanitary sewer overflows (“SSOs”) in the Commonfields of Cahokia Public Water District (“Commonfields”), located in Centreville, Illinois. EPA inspectors observed SSOs and serious operations and maintenance deficiencies during inspections of the sanitary sewer systems in Commonfields. EPA previously provided Inspection Reports documenting these issues and observed SSOs to Commonfields. SSOs have been documented on at least 25 occasions since January 26, 2021, based on EPA field observations and SSO reports submitted to EPA by Commonfields. EPA’s Inspection Reports are also available on EPA’s East Saint Louis Area SSO website at <https://www.epa.gov/il/communities-east-st-louis-area-and-sanitary-sewer-overflows>. SSOs that reach waters of the U.S. are point source discharges and prohibited under the CWA.

A systematic operation, maintenance, and rehabilitation program is an essential element in the management of a sanitary sewer collection system. Implementing such a program requires a sufficient number of properly trained operation and maintenance staff members. EPA is concerned about the potential impact that the merger between Commonfields, Alorton, Cahokia and Centreville into Cahokia Heights and the subsequent transition period may have on sewer utility staffing, given the number of manually operated sewer lift stations in Commonfields and the lack of automated sewer system controls and overflow alarms. Failure to maintain sufficient

sewer utility staffing may result in additional SSOs that can contaminate waters, causing serious water quality problems, and back-up into yards and homes, causing property damage and threatening public health. Because SSOs contain raw sewage, the overflows can carry bacteria, viruses, protozoa (parasitic organisms), helminths (intestinal worms), inhaled molds and fungi. As a result, SSOs may cause diseases ranging in severity from mild gastroenteritis (causing stomach cramps and diarrhea) to life-threatening ailments such as cholera, dysentery, infections hepatitis, and severe gastroenteritis.

### Opportunity to Confer

As the Chairman of the Commonfields Board of Trustees and Mayor-Elect of the City of Cahokia Heights (“City”), EPA is extending to you an opportunity to advise the Agency of any additional information EPA should consider regarding SSOs and sewer utility staffing during the merger and following transition period. If you agree to a meeting, please plan for technical and management personnel from Commonfields and the City to attend the meeting. You may have an attorney represent you at this meeting. The EPA contact in this matter is Dean Maraldo. You or your staff may call him at (312) 353-2098 or email him at maraldo.dean@epa.gov to make arrangements for the meeting. Given the urgency, we propose meeting virtually during the week of May 3, 2021, or at your earliest convenience.

### Next Steps

If the Agency ultimately determines that Commonfields and/or the City is not in compliance with applicable requirements, then EPA will consider enforcement options available under Section 309 of the CWA, which may include the issuance of an administrative compliance order, issuance of an administrative penalty order, and pursuing a judicial civil or criminal action.

We look forward to receiving your response.

Sincerely,

Michael D. Harris  
Director  
Enforcement and Compliance Assurance Division

cc: La Mar Gentry, Village of Alorton Administrator [lamardgent@gmail.com]  
Mayor Marius Jackson, City of Centreville [Mayor@cityofcentreville-il.com]  
Mayor Curtis McCall, Jr., Village of Cahokia [cmccall@cahokiaillinois.org]  
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